

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

LINDA A. ALLEN, in her Individual Capacity  
and as Trustee of the GOLDEN ASSETS  
SETTLEMENT TRUST;  
BERRIEN COUNTY, MICHIGAN;  
ST. JOSEPH CHARTER TOWNSHIP,  
BERRIEN COUNTY, MICHIGAN

*Defendants.*

Case No. 1:25-cv-118

District Judge Paul L. Maloney

Magistrate Judge Phillip J. Green

**DECLARATION OF DANIELLE E. SUMNER IN SUPPORT OF  
UNITED STATES' MOTION FOR CLERK'S ENTRY OF DEFAULT  
AGAINST GOLDEN ASSETS SETTLEMENT TRUST**

In support of my request for Clerk's Entry of Default, I state pursuant to 28 U.S.C.

§ 1746 that:

1. I am an attorney in the Department of Justice, Tax Division, and am counsel of record in this case.
2. On March 8, 2025, a process server personally served the defendant Linda A. Allen, as Trustee of the Golden Assets Settlement Trust ("the Trust"), with the summons and copy of the complaint at 1619 Lyola Avenue, Benton Harbor, MI 49022. ECF No. 13.
3. As reflected on the docket sheet, the Trust, has failed to plead or otherwise defend in accordance with Fed. R. Civ. P. 12.
4. I have not received an answer or other response from the Trust.
5. The Trust is not an infant, incompetent person, or a member of the military service.

I declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct.

Date: June 5, 2025



DANIELLE E. SUMNER  
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U.S. Department of Justice  
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**CERTIFICATE OF SERVICE**

On June 5 2025, I caused the foregoing Declaration in Support of the United States' Motion for Clerk's Entry of Default to be filed electronically with the Clerk of Court through ECF, and I caused a copy of the foregoing document and notice of electronic filing to be mailed by first-class mail, postage paid, to the following non-ECF participant:

Linda A. Allen  
1619 Lyola Court  
Benton Harbor, MI 49022

/s/ Danielle E. Sumner  
Danielle E. Sumner  
Trial Attorney  
U.S. Department of Justice